

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

SEALED

v.

Case No. 17-mj-44

JOSEPH JAKUBOWSKI,

Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18,
UNITED STATES CODE, SECTION 922(u)

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

COUNT 1

On or about April 4, 2017, in the Western District of Wisconsin, the defendant,

JOSEPH JAKUBOWSKI,

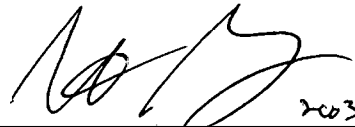
knowingly stole from Armageddon Supplies, 2144 West U.S. Highway 14, Janesville, Wisconsin, a business that is licensed to engage in dealing of firearms, firearms in the licensee's business inventory that had previously been shipped in interstate commerce, specifically:

- A Nodak Spud LLC, Model NDS-XM16E1, .223 caliber M16 fully automatic rifle, serial number B01400;
- A Glock 19 GEN-4, 9 mm semi-automatic pistol, serial number BDVN646;

- A Tirant AAC, Model 45 silencer, serial number TR45-7646; and
- A Yankee Hill M, Model 22 Mite silencer, serial number MS3580.

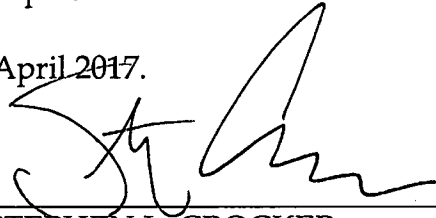
(In violation of Title 18, United States Code, Section 922(u).)

This complaint is based on the attached affidavit of Special Agent Justin Fahy,
ATF.



JUSTIN FAHY, Special Agent
Bureau of Alcohol, Tobacco, Firearms, and
Explosives

Sworn to before me this 7th day of April 2017.



STEPHEN L. CROCKER
United States Magistrate Judge

AFFIDAVIT

COUNTY OF DANE)
) ss
STATE OF WISCONSIN)

I, Justin Fahy, first being duly sworn under oath, hereby depose and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives and have been so employed for approximately 22 months. I am currently assigned to the Madison Field Office. My primary duties are investigating violations of the federal firearms laws.

2. On April 4, 2017, at approximately 8:40 p.m., a white male forced entry into Armageddon Supplies, 2144 West U.S. Highway 14, Janesville, Wisconsin. The owner of Armageddon Supplies is a federal firearms licensee. An interior high definition security camera captured a video of the white male and images of him are clearly defined.

3. The front window of the business was destroyed and blood was observed on broken glass by responding law enforcement officers. The video depicts the white male removing rifles from a gun rack and going to a display case. According to the owner of Armageddon Supplies, the white male stole 16 handguns, 2 long guns, and 2 silencers. These include: a Nodak Spud LLC, Model NDS-XM16E1, .223 caliber M16 fully automatic rifle, serial number B01400; a Glock 19 GEN-4, 9 mm semi-automatic

pistol, serial number BDVN646; a Tirant AAC, Model 45 silencer, serial number TR45-7646; and a Yankee Hill M, Model 22 Mite silencer, serial number MS3580.

4. At approximately 9:10 p.m., officers located a vehicle on fire less than two miles away from Armageddon Supplies. The vehicle is registered to Joseph Jakubowski, white male, DOB: [REDACTED] 1984.

5. Officers obtained a photograph of Jakubowski and compared it to the video surveillance footage from Armageddon Supplies. Based on their review of the photograph and video, it is their opinion that the Armageddon Supplies burglar is Jakubowski.

6. Officers subsequently interviewed Jakubowski's sister and she said Jakubowski had been staying with her. On April 6, 2017, officers searched a trash bag that the sister had placed on her curb and they found a note that contained an "apology" to Armageddon Supplies. The author of the note stated "I would have purchased the items," but couldn't because of a felony conviction.

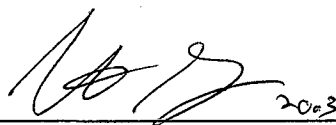
7. According to information on the Wisconsin Court System Circuit Court Access, Joseph Jakubowski, DOB: [REDACTED]/1984, was convicted of Disarming a Peace Officer, a class H felony, in Rock County Wisconsin Case Number 2008CF647.

8. Also on April 6, 2017, officers interviewed a friend of Jakubowski's. According to the friend, Jakubowski had announced that he was going to steal guns from Armageddon Supplies.

9. A second witness, after seeing a news account of the burglary, told law enforcement officers that Jakubowski had talked about committing a burglary.

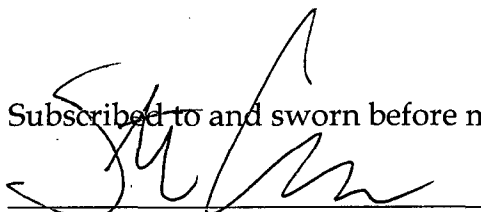
10. A third witness told officers she was with Jakubowski prior to the Armageddon Supplies burglary and when she saw a photograph of the burglar, who was wearing a black coat, blue jeans and a hat, on the news, she said Jakubowski was wearing identical clothing prior to the burglary.

11. ATF Special Agent Mike Aalto, who has specialized training and experience regarding where firearms manufacturers, told me that the firearms and silencers listed in the complaint were not manufactured in the State of Wisconsin.



JUSTIN FAHY, Special Agent
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

Subscribed to and sworn before me this 7th day of April 2017.



STEPHEN L. CROCKER
United States Magistrate Judge